

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

PROGRESSIVE SPECIALTY	)	
INSURANCE COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO: 2:06-CV-336-MHT
	)	
DARRYL D. FINCH, et al.,	)	
	)	
Defendants.	)	

**MOTION FOR SUMMARY JUDGMENT**

Comes now the plaintiff, Progressive Specialty Insurance Company ("Progressive"), pursuant to Rule 56(c) of the Federal Rules of Civil Procedure, and moves the court to enter a summary judgment in its favor on the grounds that there are no genuine issues as to any material fact and that it is entitled to a summary judgment as a matter of law.

This motion is based upon the pleadings and attached exhibits. Progressive is submitting a statement of undisputed facts and memorandum brief in additional support of this motion.

/s/ R. Larry Bradford  
R. Larry Bradford, Attorney for Plaintiff,  
Progressive Specialty Insurance Company  
Attorney Bar Code: BRA039

OF COUNSEL:

Bradford & Sears, P.C.  
2020 Canyon Road, Suite 100  
Birmingham, AL 35216  
(205) 871-7733

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing has been served upon the following via electronic filing on this 23rd day of March, 2007.

W. Terry Bullard, Esq.  
P.O. Box 398  
Dothan, Alabama 36302

Brandon L. Blankenship, Esq.  
3120 Amsouth/Harbert Plaza  
PO Box 13067  
Birmingham, AL 35202-2067

/s/ R. Larry Bradford  
OF COUNSEL